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Retrieval Inc. and Superior Information Services Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALBERT KNIGHT, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

CHOICEPOINT INC., *et al.*,

Defendants.

Case No. 08-04676-NLH-KMW

Judge: Hon. Noel L. Hillman
Magistrate Judge: Hon. Karen M. Williams

**CONSENT MOTION TO EXTEND THE
TIME FOR DEFENDANTS TO MOVE,
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S AMENDED
COMPLAINT**

Pursuant to Civil Local Rule 6.1, Defendants ChoicePoint Inc., ChoicePoint Services Inc., National Data Retrieval Inc. and Superior Information Services Inc. respectfully move for an order granting Defendants a brief extension, from September 14 to September 25, 2009, of the

time to move, answer or otherwise respond to Plaintiff Albert Knight's Amended Complaint. Plaintiff has consented to Defendants' request for an extension and does not oppose this motion.

In support of this motion, Defendants aver as follows:

1. The current deadline for Defendants to move, answer or otherwise respond to the Amended Complaint is September 14, 2009 (Dkt. No. 52).
2. On September 11, 2009, counsel for the parties met and conferred about a modest continuance to the response deadline.
3. The instant action, as opposed to the twelve actions filed by Plaintiff's counsel on behalf of *individual* plaintiffs in this District and the Eastern District of Pennsylvania, is a putative class action.
4. Given the current workload of counsel for both Plaintiffs and Defendants with respect to the individual cases since the Judicial Panel of Multidistrict Litigation's recent decision denying transfer and consolidation (*see* Dkt. No 49), counsel agree that the issues in this putative class action will be more thoroughly presented to the Court with a short continuance of the current response deadline.
5. Defendants accepted service of original process on October 15, 2008.
6. No extensions have been sought previously in connection with Defendants' response to Plaintiff's Amended Complaint.
7. Granting this extension will not affect other deadlines in this action.
8. The undersigned, as mentioned, represents that Plaintiff has consented to Defendants' request for an extension.
9. Pursuant to Local Rule 7.1(d)(4), no brief is necessary as this motion does not raise novel or complex legal issues.

WHEREFORE, Defendants respectfully request that the Court enter an order extending the time in which Defendants must answer, move or otherwise respond to Plaintiff's Amended Complaint to September 25, 2009.

Dated: September 11, 2009

MORRISON & FOERSTER LLP
FARUKI IRELAND & COX P.L.L.
HANGLEY, ARONCHICK, SEGAL & PUDLIN, P.C.

By: s/ Sharon F. McKee
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